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IN THE

Supreme Court of the United States

No. 71-52

ARTHUR THEODORE TAITANO and
JANE K. FUJIWARA,

Petitioners,

v.

UNITED STATES OF AMERICA,

Respondent.

ON PETITION FOR A WRIT OF CERTIORARI TO THE UNITED STATES COURT OF APPEALS FOR THE NINTH CIRCUIT

PETITIONERS' REPLY MEMORANDUM

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1. The government errs in denying the conflict that has developed among the courts of appeals concerning the permissible scope of the comments a prosecutor may lawfully make, in keeping with the Fifth Amendment, that the evidence presented against the defendant is uncontradicted by him. Specifically, the conflict is over whether the prosecutor's comments, that the defendant has not contradicted the evidence; made repeatedly and with specific reference to the defendant individually, have a cumulative effect tanta-

mount to a constitutionally proscribed direct comment by the prosecutor that the defendant had failed to testify in his own behalf.

The courts of appeals that have so ruled—the First[1] and Tenth[2] Circuits—have stressed such cumulative impact, as well as the adverse effect of the prosecutor's singling out for comment those specific defendants who had not testified from those who had. The conflicting courts of appeals—the Ninth,[3] Second[4] and Seventh[5] Circuits—on the other hand, have refused to declare comparable comments by the prosecutor as constitutionally impermissible (*see* Pet. 14-15). Yet, in each instance, all the courts of appeals treating the issue have purported to apply the rule laid down by this Court in *Griffin v. Illinois*, 380 U.S. 609, 615 (1965), that "the Fifth Amendment . . . forbids . . . comment by the prosecution on the accused's silence. . . ."

It will not do for the government to belittle the conflict among the courts of appeals by characterizing it as concerning only the "result reached on the facts of the case" (Br. Op. 4) or as involving merely "a factual issue to be determined in the context of each case" (Br. Op. 6). For the dispute here presented involves in truth a question of constitutional dimension: namely, what *criteria* are to be used in applying the broadly stated proscription, deriving from the Fifth Amendment, against comment by the prosecution on an accused's silence. Unless resolved by this Court, the

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[1]Rodriguez-Sandoval v. United States, 409 F.2d 529 (1st Cir. 1969).

[2]Doty v. United States, 416 F.2d 887 (10th Cir. 1968), *cert. granted and judgment vacated sub nom.* Epps v. United States, 401 U.S. 1006 (1971).

[3]Pet. App. A.

[4]United States *ex rel.* Leak v. Follette, 418 F.2d 1266 (2d Cir. 1969), *cert. denied*, 397 U.S. 1050 (1970).

[5]United States v. Lyon, 397 F.2d 505 (7th Cir.), *cert. denied sub nom.* Lyczyk v. United States, 393 U.S. 846 (1968).

conflict among the circuits over this compelling question promises to engender further uncertain and inconsistent readings of *Griffin*, with future adverse consequences to numerous accused persons in addition to petitioners here.

2. With little more than argument by assertion, the government (Br. Op. 6-7) perpetuates the Ninth Circuit's error (*see* Pet. App. A, at 3) in interpreting the term, "laws . . . of the United States," contained in 18 U.S.C. § 1952(b)(1), by disregarding established principles of statutory construction (*see* Pet. 16). The resolution of this issue, it is essential to recall, is of paramount importance to the proper disposition of the present case; if the court below had construed Section 1952 in accordance with well-settled canons of statutory construction, the prosecution would have been barred by 18 U.S.C. § 2516 from offering immunity under 18 U.S.C. § 2514 to any of its witnesses, without whose testimony there would have been no convictions (*see* Pet. 18).

(a) As in the court of appeals below, the government continues to rely (Br. Op. 7) upon a bald reading of the definition of "[t]he term '*United States*,'" in 18 U.S.C. § 5 to bring the penal laws of the Territory of Guam within the meaning of the term "*laws . . . of the United States*" contained in 18 U.S.C. § 1952(b)(1) (emphasis added). This approach, however, begs the central question: whether Congress intended to enlarge and expand the historic and established meaning of the term "*laws . . . of the United States*" (*see* Pet. 16) when it stated in 18 U.S.C. § 5 that "[t]he term '*United States*,' *as used . . . in a territorial sense*, includes all places . . . subject to the jurisdiction of the United States . . ." (emphasis added).

Surely, a clearer indication of congressional purpose would be necessary before a definition relating to a geographical location over which the United States has jurisdiction could be imported into the term of art, "*laws . . . of* the United States," which invariably has meant "acts of Congress." *Beck v. Johnson*, 169 Fed. 154, 162-63 (C.C.

W.D. Ky. 1909); *see Osborn v. Bank of the United States*, 9 Wheat. 738, 825 (U.S. 1824). Indeed, Congress well knows how to indicate its intention plainly when it wishes to differentiate between the definition of the term, "United States," when used in a "geographical" or "territorial" sense and the definition of the term, "United States," when used in a general or unqualified sense. Thus, for example, 42 U.S.C. § 410(i) provides that "[t]he term 'United States' *when used in a geographical sense* means the States, the District of Columbia, the Commonwealth of Puerto Rico, the Virgin Islands, Guam and American Samoa," whereas 42 U.S.C. § 2492(2) states that "[t]he term 'United States' means any State of the United States, the District of Columbia, the Commonwealth of Puerto Rico, Guam, the Virgin Islands and American Samoa" (emphasis added).

The foregoing distinction is made throughout the United States Code, as is shown in Appendix A to this Reply Memorandum, in which every Code provision which either directly or indirectly includes "Guam" within the definition of "United States" is differentiated on the basis of whether the definition of United States is or is not qualified by the language "when used in a geographical [or territorial] sense." We further set forth in Appendix B all provisions of the United States Code in which "Guam" is either directly or indirectly excluded from the definition of the term, "United States," whether or not used in a geographical or territorial sense. Finally, for purposes of completeness, we set forth in Appendices C and D every provision of the United States Code in which "Guam" is either directly or indirectly included in or excluded from the definition of the term, "State."

(b) No more persuasive is the government's reliance (Br. Op. 7) upon the definition of "interstate commerce" in 18 U.S.C. § 10, which, it says, indicates the congressional intention to have 18 U.S.C. § 1952 apply to Guam. But this argument merely highlights the conflict between the Ninth Circuit's approach in the present case and the Third

Circuit's approach in *United States v. Baker*, 364 F.2d 107, 110 (3d Cir.), *affirming* 241 F. Supp. 272 (M.D. Pa. 1965), *cert. denied*, 385 U.S. 986 (1966), a case involving 18 U.S.C. § 1953, a companion statute to the one at issue here (*see* Pet. 18). In *Baker*, a parallel argument was made (241 F. Supp. at 279): "[S]ince the condemnation [in Section 1953] is to both interstate and foreign commerce, it follows that . . . the term 'State' is used in its generic sense, meaning independent political entity." The court rejected the argument, holding "that when Congress used the word 'State' in the statute herein involved it meant 'State' within the constitutional sense, that is, a State of the Union" (*id.*).[6]

The *Baker* case and the listings of the United States Code provisions in the Appendices A-D make clear that, whenever Congress has intended the term, "United States" or "State," to go beyond its constitutional meaning and to extend to the territories or possessions, it has expressly so defined the term in the relevant statutory provision (*see* Pet. 16-18). As stated by the First Circuit in *Munoz v. Porto Rico Ry. Light & Power Co.*, 83 F.2d 262, 266 (1936):

> "It has generally been customary for Congress, in extending legislation to the territories and 'possessions' of the United States, to expressly mention them as included within the purview of the act."

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[6] *Cf.* Scott v. Jones, 5 How. 343 (U.S. 1847), and Miners' Bank v. Iowa *ex rel.* District Prosecuting Attorney, 12 How. 1 (U.S. 1851), in which this Court held that under the Judiciary Act, Rev. Stat. § 709, permitting writs of error to the highest court of a State in cases in which the validity of a *State statute* is drawn into question, an act of a *territorial* legislature was not to be considered a *State* statute for purposes of conferring jurisdiction. *See also* Downes v. Bidwell, 182 U.S. 244, 259, 270 (1901).

For the foregoing reasons, as well as for the reasons set forth in the petition, certiorari should be granted.

Respectfully submitted,

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APPENDIX A

PROVISIONS OF THE UNITED STATES CODE IN WHICH THE *INCLUSION* OF "GUAM" IN THE DEFINITION OF THE "UNITED STATES" IS *DIFFERENTIATED* ON THE BASIS OF WHETHER THE TERM, "UNITED STATES" IS OR IS NOT USED IN A GEOGRAPHICAL OR TERRITORIAL SENSE [39][1]

TITLE	SECTION	SUBJECT
		I. "United States" Defined in a Geographical or Territorial Sense [15]
		A. *Direct Reference to "Guam" in the Definition* [5]
8	1101(a)(38)	Aliens & Nationality–Immigration Definitions
26	3121(e)(2)	Internal Revenue Code–Insurance Contributions Act
42	410(i)	Public Health & Welfare–Social Security
42	2949(1)	Public Health & Welfare–Economic Opportunity
50 App.	466(b)	War & National Defense–Selective Service Act of 1967
		B. *Indirect Reference by Use of the Term, "Possession" or "Possessions"* [8]
20	901(4)	Education–Overseas Teachers
22	456(a)	Foreign Relations, etc.–Foreign Wars–Neutrality
22	611(m)	Foreign Relations, etc.–Foreign Agents–Propaganda
22	1621(b)	Foreign Relations, etc.–Settlement of International Claims
22	1395(a)(1)	Foreign Relations, etc.–The Philippines

[1] The number of statutory provisions in each category are set forth in brackets.

TITLE	SECTION	SUBJECT
26	4920(6)	Internal Revenue Code–Interest Equalization Tax
33	511	Navigation, etc.–Bridges over Navigable Waters
42	2014(bb)	Public Health & Welfare–Atomic Energy

C. *Indirect Reference by Use of the Term, Places "Subject to the Jurisdiction of the United States"* [2]

18	5	Crimes & Criminal Procedure–General Provisions
41	10c(a)	Public Contracts–General Provisions

II. "United States" Defined in a General or Unqualified Sense [24]

A. *Direct Reference to "Guam" in the Definition* [6]

16	460*l*-3	Conservation–Recreational Areas
21	134(c)	Food & Drugs–Animals, Meats & Dairy Products
33	1161(a)(5)	Navigation, etc.–Pollution Control
33	1163(a)(4)	Navigation, etc.–Pollution Control
42	1855a(b)	Public Health & Welfare–Disaster Relief
42	2492(2)	Public Health & Welfare–Loan Service for Handicapped

B. *Indirect Reference by Use of the Term, "Possession" or "Possessions"* [13]

7	150aa(e)	Agriculture–Plant Pests
7	1431	Agriculture–Agricultural Adjustment Act of 1938
15	633(a)	Commerce & Trade–Small Business Aid
18	1401	Crimes & Criminal Procedure–Narcotics

TITLE	SECTION	SUBJECT
20	107e(a)	Education–Vending Stands for Blind
22	2522(b)	Foreign Relations, etc.–Peace Corps
35	100(c)	Patents–Patentability of Inventions
40	612(7)	Public Buildings, etc.–Construction, etc. of Public Buildings
42	1951	Public Health & Welfare–Water Research & Development
47	153(g)	Telegraphs, Telephones, etc.–Wire or Radio Communication
47	330(b)(2)	Telegraphs, Telephones, etc.–Wire or Radio Communication
49	1301(35)	Transportation–Federal Aviation
50 App.	2252(f)	War & National Defense–Civil Defense

C. *Indirect Reference by Use of the Term, Places "Subject to the Jurisdiction of the United States"* [5]

8	1185(d)	Aliens & Nationality–Immigration
15	1127	Commerce & Trade–Trademarks
16	951(e)	Conservation–Tuna Conventions
22	408a	Foreign Relations, etc.–Wars–Materials
47	38	Telegraphs, Telephones, etc.–Submarine Cables

APPENDIX B

PROVISIONS OF THE UNITED STATES CODE IN WHICH "GUAM" IS *EXCLUDED* FROM THE DEFINITION OF "UNITED STATES"[2] [35]

TITLE	SECTION	SUBJECT
	I. Direct Reference to "Guam" in the Definition [5]	
19	172	Customs Duties–Tariff Related Provisions
19	1337(h)	Customs Duties–U.S. Tariff Commission
19	1401(k)	Customs Duties–Tariff Act–Administrative Provisions
*19	1709(a)	Customs Duties–Smuggling
42	403(k)	Public Health & Welfare–Social Security
	II. Indirect Reference by Defining "United States" To Mean–[30]	
	A. *States of the Union Only* [4]	
*5	8501(7)	Government Organization–Unemployment Compensation
*15	79b(a)(25)	Commerce & Trade–Utility Holding Companies
42	1301(a)(2)	Public Health & Welfare–Social Security
30	351	Mineral Lands & Mining–Lease of Mineral Deposits

[2]Since the distinction between the qualified definition "when used in a geographical sense" and the unqualified definition is not directly relevant to the exclusion of Guam from the definition, no separate categories are set forth; the qualified definition, however, is designated by an asterisk.

TITLE	SECTION	SUBJECT
	B. *States and the District of Columbia* [15]	
*5	5921(4)	Government Organization–Overseas Differentials & Allowances
*5	6301(1)	Government Organization–Annual Sick Leave
*10	101(1)	Armed Forces–Organization
19	1336(h)(2)	Customs Duties–U.S. Tariff Commission
20	442(a)(3)(B)	Education–National Defense Education Program
21	149(b)	Food & Drugs–Meat & Dairy Products
*26	7701(9)	Internal Revenue Code–Procedure & Administration
29	41(h)(4)	Labor–Vocational Rehabilitation
33	1157(h)(3)	Navigation, etc.–Pollution Control
*37	101(1)	Pay & Allowances–Definitions
*45	228a(e)	Railroads–Retirement Act of 1937
*45	351(s)	Railroads–Unemployment Insurance
49	303(a)(8)	Transportation–Motor Carriers
49	902(j)	Transportation–Water Carriers
49	1002(a)(4)	Transportation–Freight Forwarders
	C. *States, District of Columbia and Puerto Rico* [5]	
7	1561(a)(1)	Agriculture–Seeds
*19	1978(8)	Customs Duties–Trade Expansion Program
*22	1360(a)(2)	Foreign Relations–The Philippines
*26	3306(j)(2)	Internal Revenue Code–Unemployment Tax
26	4502(5)	Internal Revenue Code–Sugar, Coconut & Palm Oil
	D. *States and a Territory or Territories* [4]	
7	1301(a)(5)	Agriculture–Agricultural Adjustment Act
*21	171(b)	Food & Drugs–Narcotic Drugs

TITLE	SECTION	SUBJECT
27	211(a)(1)	Intoxicating Liquors–Federal Alcohol Administration Act
*33	902(9)	Navigation, etc.–Workers' Compensation Act

E. *Miscellaneous Entities* [2]

31	444	Money & Finance–Gold Coin & Bullion
43	1333(c)(3)	Public Lands–Submerged Lands

APPENDIX C

PROVISIONS OF THE UNITED STATES CODE IN WHICH "GUAM" IS *INCLUDED* IN THE DEFINITION OF "STATE" [93]

TITLE	SECTION	SUBJECT
	I. Direct Reference to "Guam" in the Definition [53]	
7	2042(f)	Agriculture–Farm Labor
8	1101(a)(36)	Aliens & Nationality–Immigration–Definitions
12	1422(3)	Banks & Banking–Federal Home Loan Banks
12	1707(d)	Banks & Banking–Mortgage Insurance
12	1715k(c)	Banks & Banking–Mortgage Insurance
12	1715y(b)	Banks & Banking–Mortgage Insurance
12	1747*l*(q)	Banks & Banking–Rental Housing
12	1748(g)	Banks & Banking–Armed Services Housing
12	1749aaa-5(5)	Banks & Banking–Group Practice Facilities
12	1750	Banks & Banking–National Defense Housing
12	1813(a)	Banks & Banking–Federal Deposit Insurance.
15	297(b)	Commerce & Trade–Falsely Stamped Gold or Silver
15	1015	Commerce & Trade–Insurance Regulation
15	1171(b)	Commerce & Trade–Transportation of Gambling Devices
16	8f	Conservation–National Parks Service

TITLE	SECTION	SUBJECT
16	17n	Conservation – National Parks Service
16	460*l*-8(b)	Conservation – Outdoor Recreation Programs
20	244(8)	Education – Financial Assistance
20	332b(1)	Education – Studies & Research
20	358(a)	Education – Public Libraries
20	403(a)	Education – National Defense Education Program
20	615(c)	Education – Handicapped Children Teaching Grants
20	645(13)	Education – School Construction
20	751(m)	Education – Higher Education Facilities
20	805(a)	Education – Community Development Programs
20	881(j)	Education – Educational Materials Grants
20	952(g)	Education – National Foundation on the Arts & Humanities
20	1141(b)	Education – Higher Education Resources, etc.
20	1203(f)	Education – Basic Adult Education
26	3121(e)(1)	Internal Revenue Code – Federal Insurance Contributions Act
29	41(g)	Labor – Labor Statistics
29	302(g)	Labor – Welfare & Pension Plans Disclosure
29	402(b)	Labor – Labor-Management Disclosure Procedure
30	802(c)	Mineral Lands & Mining
33	1173(d)	Navigation, etc. – Pollution Control
42	246(g)(4)(B)	Public Health & Welfare – Public Health Service
42	263c(5)	Public Health & Welfare – Public Health Service
42	2910(a)	Public Health & Welfare – Public Health Service
42	298b(a)	Public Health & Welfare – Public Health Service

TITLE	SECTION	SUBJECT
42	299b(a)(1)	Public Health & Welfare—Public Health Service
42	410(h)	Public Health & Welfare—Social Security
42	1301(a)(1)	Public Health & Welfare—Social Security
42	1500e(3)	Public Health & Welfare—Urban Beautification, etc.
42	1784(a)	Public Health & Welfare—School Lunch Programs
42	1855a(c)	Public Health & Welfare—Disaster Relief
42	1857h(d)	Public Health & Welfare—Air Pollution Control
42	2000e(j)	Public Health & Welfare—Civil Rights
42	2618	Public Health & Welfare—Manpower Development & Training
42	2949(1)	Public Health & Welfare—Economic Opportunity Program
42	3002(3)	Public Health & Welfare—Programs for Elderly
42	3252(2)	Public Health & Welfare—Solid Waste Disposal
46	526u	Shipping—Motor Boat Regulation
46	527(5)	Shipping—Motor Boat Regulation

II. Indirect Reference by Use of the Term, "Possession" or "Possessions" [40]

4	110(d)	Flag & Seal, Seat of Government, etc.
5	500(a)(2)	Government Organization—Administrative Procedure
5	1501(1)	Government Organization—Political Activity
7	3	Agriculture—Commodity Exchanges
7	147a(a)	Agriculture—Insect Pests
7	183	Agriculture—Packers & Stockyards
7	511(i)	Agriculture—Tobacco Statistics

TITLE	SECTION	SUBJECT
7	1431	Agriculture–Price Supports
11	1(29)	Bankruptcy
12	202	Banks & Banking–National Banks
12	1701q(d)(5)	Banks & Banking–National Housing
12	1749bbb-2(a)(11)	Banks & Banking–Insurance Development
12	1749c(e)	Banks & Banking–Educational Institutions
15	78c(a)(16)	Commerce & Trade–Securities Exchanges
15	80a-2(a)(39)	Commerce & Trade–Investment Companies
15	80b-2(19)	Commerce & Trade–Investment Advisers
15	431(d)	Commerce & Trade–Boards of Trade
15	662(4)	Commerce & Trade–Small Business Investment Program
18	591	Crimes & Criminal Procedure–Elections & Political Activities
18	921(a)(2)	Crimes & Criminal Procedure–Firearms
18	2510(3)	Crimes & Criminal Procedure–Wire Interception
20	107e(c)	Education–Vending Stands for the Blind
21	114a	Food & Drugs–Prevention of Contagion
21	114f	Food & Drugs–Prevention of Contagion
26	4920(a)(6)	Internal Revenue Code–Interest Equalization Tax
29	203(c)	Labor–Fair Labor Standards
29	262(e)	Labor–Portal to Portal Pay
38	101(20)	Veterans' Benefits–General Provisions
40	319c(a)	Public Buildings, etc.–Public Property
40	484(1)(D)	Public Buildings, etc.–Management of Government Property

TITLE	SECTION	SUBJECT
42	1402(12)	Public Health & Welfare—Low Rent Housing
42	1460(h)	Public Health & Welfare—Slum Clearance & Urban Renewal
42	1496	Public Health & Welfare—Public Works
42	1590(e)	Public Health & Welfare—National Defense Housing
42	1592n(a)	Public Health & Welfare—National Defense Housing
42	2021(n)	Public Health & Welfare—Atomic Energy
42	3338(3)	Public Health & Welfare—Demonstration Cities
49	122	Transportation—Bills of Lading
49	1608(c)(1)	Transportation—Federal Aviation Program
50 App.	1894(i)(6)(j)(1)	War & National Defense—Maximum Rents

APPENDIX D

PROVISIONS OF THE UNITED STATES CODE IN WHICH "GUAM" IS *EXCLUDED* FROM THE DEFINITION OF "STATE" [65]

TITLE	SECTION	SUBJECT
	I. Direct Reference to "Guam" in the Definition [4]	
20	403(a)	Education–National Defense Education Program
20	1322(a)(3)(A)	Education–Residential Vocational Education
42	418(b)(1)	Public Health & Welfare–Federal Old Age Insurance
42	2752(d)	Public Health & Welfare–Economic Opportunity Program
	II. Indirect Reference by Defining "State" To Mean– [61]	
	A. *State of the Union Only*[3] [6]	
15	77ccc(14)	Commerce & Trade–Exports
16	669a	Conservation–Wildlife Restoration
16	777a(d)	Conservation–Fish Restoration
20	867(a)	Education–Grants
40	522(a)	Public Buildings, etc.–Management of Government Property
43	1301(g)	Public Lands–Submerged Lands
	B. *State or the District of Columbia* [17]	
3	21(a)	The President–Presidential Elections
7	2012(j)	Agriculture–Food Stamp Program

[3]For purposes of present analysis, the Territories of Alaska and Hawaii are treated as States in those statutory provisions enacted before the two Territories became States. *See, e.g.*, 16 U.S.C. § 669a.

TITLE	SECTION	SUBJECT
12	1427(a)	Banks & Banking–Federal Home Loan Banks
15	79b(a)(24)	Commerce & Trade–Public Utility Holding Companies
18	831	Crimes & Criminal Procedure–Explosives, etc.
26	7701(10)	Internal Revenue Code–Definitions
36	420	Patriotic Societies–Conference of State Societies
36	588	Patriotic Societies–Foundation of the Federal Bar Association
39	6303(c)	Postal Service–Air Mail
42	27	Public Health & Welfare–Public Health Service
42	1546	Public Health & Welfare–Arbitration
42	1547	Public Health & Welfare–Arbitration
45	351(t)	Railroads–Unemployment Insurance
49	303(a)(8)	Transportation–Motor Carriers
49	902(k)	Transportation–Water Carriers
49	1002(a)(3)	Transportation–Freight Forwarders
49	1101(a)(12)	Transportation–Public Airport Development

C. *State or the Commonwealth of Puerto Rico* [7]

7	349	Agriculture–Agricultural College Aid
7	361a	Agriculture–Agricultural Experiment Stations
7	390b(1)	Agriculture–Research Facilities
12	1464(d)(13)(A)(2)	Banks & Banking–Savings & Loan Associations
12	1730(q)(1)(B)	Banks & Banking–Savings & Loan Accounts
42	1961c-6	Public Health & Welfare–Water Resources
46	1126(b)(5)(b)	Shipping–Merchant Marine Act of 1936

TITLE	SECTION	SUBJECT
	D. *State, the District of Columbia, or Puerto Rico* [9]	
5	8501(6)	Government Organization–Unemployment Compensation
5	8521(a)(3)	Government Organization–Ex-Servicemen
12	1730a(a)(1)(J)	Banks & Banking–Savings & Loan Accounts
15	375(6)	Commerce & Trade–State Cigarette Taxes
19	81a(c)	Customs Duties–Foreign Trade Zones
19	1978(8)	Customs Duties–Adjustment Assistance
23	101	Highways–Federal Aid
26	3306(j)(1)	Internal Revenue Code–Unemployment Tax
42	1301(a)(1)	Public Health & Welfare–Social Security
	E. *State, as well as Other Specific Named Entities, Such as the Virgin Islands and/or the Canal Zone* [8]	
7	1837	Agriculture–Soil Bank Program
16	590q(a)	Conservation–Soil Conservation
20	1088(a)	Education–Cooperative Education Programs
20	1134h(a)	Education–Education for Public Service Grants, etc.
38	1601(a)(8)	Veterans' Benefits–Education for Korean Veterans
38	1701(a)(8)	Veterans' Benefits–War Orphans' Educational Assistance
38	2007(c)	Veterans' Benefits–Unemployment Compensation
42	201(f)	Public Health & Welfare–Public Health Service

TITLE	SECTION	SUBJECT
		F. *State, a Territory, Territories or any Organized Territory* [9]
7	1301(a)(G)(6)	Agriculture–Agriculture Adjustment Act
12	215b(2)	Banks & Banking–Consolidation & Merger
15	717a(4)	Commerce & Trade–Natural Gas
16	718(b)	Conservation–Hunting Stamp Tax
16	796(6)	Conservation–Water Power & Resources
24	321(c)	Hospitals, etc.–Mentally Ill
28	1332(d)	Judiciary & Judicial Procedure–Diversity Jurisdiction
30	552	Mineral Lands & Mining–Coal Mine Fires
33	902(8)	Navigation, etc.–Longshoremen's & Harbor Workers' Compensation Act
		G. *Miscellaneous Entities* [5]
7	1353(b)	Agriculture–Agriculture Adjustment Act
7	1882	Agriculture–Interchange of Employees
10	2232(1)	Armed Forces–Reserve Facilities
22	456(e)	Foreign Relations, etc.–Neutrality
50 App.	2286(g)	War & National Defense–Civil Defense